

USEPA Interim Partial Comments on the draft Responses to Comments (dated January 23, 2018) for the draft Parcel D-1 RACR and the draft FSSR for Ship Berths, comments dated January 26, 2018

More comments will come soon from USEPA

D-1 RACR:

Response to Item 10, EPA General Comment #6: The response partially addresses the comment. Specifically, the proposed revised text does not clarify which sample results were averaged. For example, it is unclear if only post-remediation confirmation samples were averaged for inclusion in the RESRAD dose and risk modeling or if bias sample results were included as well. Please revise the proposed text to specify the sample results that were averaged for the RESRAD dose and risk modeling.

FSSR for Ship Berths:

Response to Item 5, EPA General Comment #1 and all subparts: The responses do not provide sufficient justification. Polonium 210 (Po-210) was identified based on a single sample; confirmation sampling should be conducted. Radon gas is generally not a problem in the Bay Area, the shoreline is windy, and the generic statements made in the responses are insufficient to demonstrate that the speculative theory that the presence of Po-210 is due to radon gas. To demonstrate this, ambient air samples collected in the vicinity of the bollards should be analyzed for radon gas. Please also give evidence that Po-210 similarly appears elsewhere on the site with similar levels of ambient radon gas. Further, Table 5-1 in the Historical Radiological Assessment indicates that the Naval Radiological Defense Laboratory (NRDL) Atomic Energy Commission (AEC) License Number 04-00487-03 included 100 curies of Po-210, so it is possible that the bollards were contaminated with Po-210 by NRDL activities. Please revise the FSSR to acknowledge the NRDL use of Po-210 as an alternate theory for Po-210 contamination of the bollards or propose collection of ambient air samples in the vicinity of the bollards that will be analyzed for radon gas. Please keep in mind that the level of effort needed to address Po-210 found is likely minor.

Responses to Items 9 and 10, EPA General Comments #5 and #6: The responses are insufficient to address the comments. Further, given the NRDL use of Po-210, it cannot be assumed that the presence of Po-210 in samples scraped from the bollards is due to naturally occurring radioactive materials (NORM). Please revise the responses and the FSSR to acknowledge that the NRDL used Po-210.

FSSR for the Former NRDL Area:

Response to Comment #7, EPA Specific Comment #3: The response partially addresses the comment. A number of radiological commodities have been found in the vicinity of the Reference Area and it is unclear if any radiological commodities have been found in the Reference Area. Please clarify whether any radiological commodities have been found in the

Reference Area and specify the distance between the Reference Area and the closest radiological commodity that has been found in that area of Parcel D-1.